

EXHIBIT 30

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF SARITA NAIR

Pursuant to 28 U.S.C. § 1746, I, Sarita Nair, hereby declare as follows:

1. I am a resident of the State of New Mexico. I am over the age of 18 and have personal knowledge of all the facts stated herein, based on my own experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the State of New Mexico as the Cabinet Secretary for the New Mexico Department of Workforce Solutions (NMDWS).

3. NMDWS administers a wide range of federally funded workforce and training programs, the state's unemployment insurance program, and the Serve New Mexico Commission that oversees AmeriCorps, all of which are vital to New Mexico's economic stability and workforce development.

4. As Cabinet Secretary, I am the chief executive of the NMDWS, and ultimately oversee all divisions, including federal contracts, federal-state programs, and federal funding.

5. The Serve New Mexico Commission, formerly known as the State Commission on National and Community Service (Serve New Mexico) was established in 1994 by Executive Order 94-03 to advise and assist New Mexico's implementation of the National and Community Service Trust Act of 1993, to develop a long-term, comprehensive national and community service plan for New Mexico, and to serve as the state's liaison to national and state organizations which support its mission. Serve New Mexico is housed within NMDWS.

6. Serve New Mexico is the state organization that administers AmeriCorps State award grants to organizations to engage individuals in sustained service to address local, regional, and national challenges.

7. AmeriCorps members across the state provide critical support as a cost-effective, well-trained, highly motivated, and flexible workforce to New Mexico's communities in the areas of disaster services, economic opportunity, education, environmental stewardship, healthy futures, and veterans and military families.

8. Since 2015: 2,868 AmeriCorps members have completed a service term in New Mexico. Collectively, these members have improved academic outcomes for 21,866 students; improved 7,373 acres of land and 1,156 miles of trails and rivers; recruited and managed 1,726 volunteers; connected 53,236 individuals to community resources; and provided job training for 976 economically disadvantaged individuals.

9. During the 2023-2024 program year, over 352 service locations within New Mexico have hosted over 3,000 AmeriCorps members and volunteers of all ages and backgrounds to unite and meet local needs, strengthen communities, and expand opportunity through national service in New Mexico.

10. In the 2023-2024 program year, AmeriCorps has invested more than \$11.5 million in federal funding to support cost-effective community solutions in New Mexico. This investment was met with the local investment of more than \$10.3 million through outside resources from businesses, foundations, public agencies, and other sources in New Mexico.

11. On or about April 15, 2025, I learned from the Serve New Mexico Executive Director that a significant portion of federal AmeriCorps Commission staff had been terminated, and that delays in funding and grant processes were likely.

12. On or about April 25, 2025, after the close of business, I learned of disruptions to our AmeriCorps programs from an email from Jennifer Basteress Tahmasebi, Interim Agency Head of the AmeriCorps Commission, stating, "Effective immediately, the AmeriCorps award

subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities.”

13. The terminated grants that were in effect at the time of termination were:

Grant Number	Organization	Project	Federal Funding
22ESDNM0010001	NACA-Inspired Schools Network	NACA-Inspired Schools Network II	\$400,000
24AFDNM0010007	Santa Fe Boys & Girls Club Inc.	Boys & Girls Clubs of Santa Fe/Las Vegas	\$250,000
24AFDNM0010001	Dream Tree Project	Enchanted Circle Corps	\$128,161
24AFDNM0010002	Albuquerque Sign Language Academy	The Albuquerque Sign Language Academy	\$387,162
24AFDNM0010004	ECO-SERVANTS	EcoServants	\$300,068
24AFDNM0010005	Rockefeller Philanthropy Advisors, Inc.	Planning Grant/Prepared To Teach	\$228,648
24AFDNM0010003	BOYS & GIRLS CLUB OF CENTRAL NEW MEXICO	Boys & Girls Clubs of Central New Mexico II	\$345,534
Total			\$2,039,573

14. The termination did not affect \$1,213,079.78 in AmeriCorps programs, for which the grant agreements are still in effect as of May 1, 2025.

15. Upon information and belief, the terminated AmeriCorps programs supported 84 full-time service members who serve across New Mexico. Those service members received:

- a. A bi-weekly living allowance;
- b. Health care benefits;
- c. Child care assistance (if eligible); and
- d. An AmeriCorps Education Award, which may be used toward school tuition, most federally approved student loans, or future education costs for up to seven years;

16. NMDWS does not have the resources to offer comparable benefits to full-time service members absent AmeriCorps funding. Thus, the loss of AmeriCorps funds will lead to termination of service members' benefits and prevent some or all of those AmeriCorps service members from continuing to serve on a full-time basis. The result will be thousands of service hours lost in service to our communities.

17. In addition, Serve New Mexico and NMDWS have suffered additional administrative costs and burdens as a result of recent events. For example:

- a. It has been my experience that, in prior years, AmeriCorps typically communicated funding decisions based on grant reviews by mid-April. Serve New Mexico then used those decisions as the basis for making its own pass-through and competitive grants. This timeline is based on the needs of our grantees, who often plan their programs around established timetables like public school calendars, as well as the timeline for recruited members.
- b. During this programming season and this busy part of the fiscal year, Serve New Mexico is traditionally in close communication with staff at AmeriCorps' national and regional staff. Upon information and belief, members of Serve New Mexico communicate with AmeriCorps staff regularly on time-sensitive topics such as the form of grant agreements and the timing of awards.
- c. However, since mid-April, AmeriCorps federal staff has only informed Serve New Mexico that these timelines will be delayed.

18. As a direct result of the AmeriCorps termination notices, Serve New Mexico has been forced to set aside its typical activities and instead focus nearly full-time on addressing the impacts of recent events. These efforts have included engagement with legal counsel; review of grant terms; and revisions to recruitment activities.

19. NMDWS, as the agency that responds to layoffs and assists displaced workers, has spent and continues to spend time and resources to help terminated AmeriCorps members through outreach, career counseling, and job placement activities.

20. Since April 15, Serve New Mexico has received inquiries from grantees, members, federal and New Mexico law-makers, and organizations that receives other types of AmeriCorps funding as to the impact of the changes at the federal level.

21. Because Serve New Mexico received no advance notice of AmeriCorps' "shift in priorities," it is unable to answer these questions.

22. Serve New Mexico is also actively engaged in discussions to evaluate what, if any, legal exposure the State may face related to the dismissal of AmeriCorps members, the termination of grants, and the program closures that may result from AmeriCorps' actions.

23. The present circumstances leave Serve New Mexico and NMDWS unable to answer its constituents and the stakeholders promptly and accurately. This further harms the State's reputation, and in turn, will discourage the recruitment of grantees and members alike.

24. Over time, the erosion of national service infrastructure threatens to diminish civic engagement, community resilience, and public trust in service-oriented institutions. The long-term loss of skilled, service-minded leaders - many of whom begin their careers through AmeriCorps service - will leave a void in the state's future workforce, particularly in sectors that rely heavily on public service. If left unaddressed, the current disruptions will permanently weaken the pipeline

of community leadership and innovation that AmeriCorps programs have helped cultivate for decades, to the detriment of all New Mexicans.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Albuquerque, New Mexico.

A handwritten signature in black ink, appearing to read 'SN', is positioned above a horizontal line.

Sarita Nair, Cabinet Secretary, New Mexico
Department of Workforce Solutions